

## REMARKS

### I. Introduction

Claims 1—23 are pending in the present application. In an April 20, 2004, Office Action (herein "Office Action"), the drawings and specification were objected to for various reasons. Applicants have amended the specification as required by the objection. Applicants respectfully assert that all the amendments to the specification and drawing figure have in no way introduced new matter to the present application and only incorporate various typographical, inadvertent errors in the present application.

Applicants also note that previous amendments to the specification corrected any deficiencies associated with reference numerals 146, 148, and 150 of Fig. 4, 69 of Fig. 5, and page 15, line 3. A substitute abstract was attached to Amendment A and Request for Reconsideration, filed February 2, 2004. Further, a substitute FIGURE 5 was submitted correcting all deficiencies. If the Examiner requires a copy of Amendment A, applicants will be happy to provide a copy. In light of the current amendment to the specification and the previously filed amendments to the specification and drawing figures, applicants respectfully request a withdrawal of all the Office Action's objections.

Claims 1-4, 7-13, and 14-23 were rejected under 35 U.S.C. 102(e) as unpatentable over U.S. Patent No. 6,476,828 to Burkett et al. (herein "Burkett"). Claims 5 and 6 were rejected under 35 U.S.C. 103(a) as unpatentable over Burkett in view of U.S. Patent No. 6,442,576 to Edelman et al. (herein "Edelman"). For the following reasons, applicants respectfully submit that the rejected claims of the present application are not anticipated or obvious over the cited and applied references, alone or in combination, because they fail to teach or suggest the association of directional properties to display object hierarchies as recited in the claims. Prior to discussing more detailed reasons why applicants believe that all the claims of the present

LAW OFFICES OF  
CHRISTENSEN O'CONNOR JOHNSON KINDNESS<sup>PLLC</sup>  
1420 Fifth Avenue  
Suite 2800  
Seattle, Washington 98101  
206.682.8100

invention are allowable, a brief description of the present invention and the cited references are presented.

A. Summary of the Present Invention

The present invention is directed to a system and method for user interface mirroring. To enable user interface mirroring, user interface objects are defined according to an object hierarchy. The object hierarchy defines a logical relationship between a root display element and one or more child display elements. In accordance with the present invention, a root element includes a directional property that defines a direction of the element when it is rendered on a display. In turn, the directional property of the root element can be inherited by each of the child elements.

To process the object hierarchy information, a layout manager obtains the logical relationship and the specified directional properties for the root and child elements. The layout manager then correlates a set of physical coordinates for each display object that accounts for the directional property of each element, while maintaining the logical relationship between the elements. A renderer renders each of the display objects according to the specified physical coordinates and directional properties. Additionally, the renderer can maintain a truth table that allows for a comparison of a directional property of an object hierarchy to specific requirements of a display element.

Numerous advantages may be realized by the system or method recited in the claims of the present application. In one aspect, a single user interface object hierarchy can be generated in any direction by the association of directional properties to the display objects. In another aspect, user interface display objects can be dynamically modified to accommodate for language reading direction without requiring a separate display object hierarchy for each language reading direction. In a further aspect, individual display elements can preserve individual display

element directional properties independent of the directional properties of the other elements in a display object hierarchy. Additional advantages may also be realized within the present invention.

B. U.S. Patent No. 6,476,828 to Burkett

Burkett is purportedly directed toward a system and method for building and displaying dynamic graphical user interfaces that can be updated without requiring code-level modification and recompilation. Burkett teaches the mapping of XML data groups to XML display layout attributes. The data within the XML data group is arranged hierarchically in accordance with conventional XML teachings. (Col. 4, lines 14-21). Each piece of data within the data group is defined by an XML tag. In accordance with the teachings of Burkett, XML display layouts are created that define the layout requirements/limitations of a particular display. As taught in Burkett, the display layouts define the physical location and relationship between display objects on the display screen. Each layout area is also defined by XML tags. Accordingly, Burkett teaches the association of display layout area information to display group data by matching XML tags from the XML data group to XML tags from the XML data layout. (Col. 8, lines 1-67).

Burkett fails to teach or suggest the association of a directional property for each display element in a display object hierarchy. Burkett also fails to teach or suggest the generation of physical coordinates for a display screen incorporating both a logical relationship and a directional property for the display object hierarchy elements.

C. U.S. Patent No. 6,442,576 to Edelman

Edelman is purportedly directed toward an apparatus and method to perform search operations on documents having nested elements. Generally described, Edelman teaches various functions related to finding elements (search function) within a document and replacing those elements (replace function). Additionally, Edelman teaches the ability to utilize the search and replace functions within embedded elements in the document.

Edelman fails to teach or suggest the association of a directional property for display elements in a display object hierarchy. Edelman also fails to teach or suggest the generation of physical coordinates for a display screen incorporating both a logical relationship and a directional property for the display object hierarchy elements.

II. The Claims Distinguished

A. Claims 1-4 and 7-13

As amended, Claim 1 reads as follows:

1. A method for processing a directional property in a display object the method comprising:

obtaining an object hierarchy having a root element and one or more child elements, wherein the object hierarchy defines a logical relationship between each object hierarchy element;

associating a directional property for the elements in the object hierarchy;

generating a set of physical coordinates corresponding to a display screen for each element in the object hierarchy, wherein the physical coordinates correspond to the logical relationship between the object hierarchy elements and the directional property associated with each element.

Claim 1 recites "associating a directional property for the elements in the object hierarchy" and "generating a set of physical coordinates corresponding to a display screen for each element in the object hierarchy, wherein the physical coordinates correspond to the logical relationship between the object hierarchy elements and the directional property associated with each element." As described above, the association of a directional property to display elements

in an object hierarchy and the generation of physical coordinates incorporating the directional property facilitate the rendering of individual elements in display object hierarchy in multiple directions.

The Office Action asserts that Burkett teaches the generation of an object hierarchy including a root element and one or more child elements defining a logical relationship between the elements. The Office Action further asserts that Burkett teaches the association of a directional property for the display object hierarchy and the generation of the physical coordinates for each element in the object hierarchy incorporating a logical relationship between the object hierarchy elements and the directional property. For the following reasons, applicants respectfully suggest that Burkett fails to teach the association of a directional property to each display element in an object hierarchy. Accordingly, Burkett would necessarily fail to teach the incorporation of the directional property in the generation of physical coordinates for each display object element.

In contrast to the limitations recited in Claim 1, Burkett clearly is limited to teaching the association of a limited subset of display information to data from an XML data group. The limited subset of information, however, does not include any type of directional property with the XML data group and/or the XML display layout. As illustrated in various drawing figures of Burkett, the layout information corresponds solely with textual alignment information, physical coordinate information and/or other traditional non-directional rendering information. None of the display information in any way defines a directional property for any element with the data group. Applicants note that *every* example included and illustrated in Burkett corresponds to a single direction, namely, a left to right language reading direction.

The Office Action cites a specific section of Burkett as teaching associating a directional property to the display object hierarchy. Applicants have reviewed the cited portion provided

below, and respectfully assert that the cited sections of Burkett relate solely to define display format information for a display layout.

Referring back to FIG. 1, once a display layout format has been selected, one or more areas within the display layout are defined (Block 102). If no areas are defined (Block 104), the display layout adopts a predefined default area (Block 106). Each defined area and each default area represents display "space" within which data items are display, as will be described below.

(Col. 5, ll. 64-67; Col. 6, ll. 1-3). Clearly, the cited section, along with the entire Burkett reference, however, is silent as to directional properties for the display elements. Applicants respectfully suggest that the cited portion and accompanying drawing figures are more in line with associating layout information for display elements relating to the location of the display objects on a portion of the display screen. However, Burkett clearly does not teach and is not directed in any manner to the association of directional properties to the display objects themselves.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). As described above, Burkett fails expressly to teach "associating a directional property for the elements in the object hierarchy" as recited in Claim 1. Because it does not teach the association of a directional property to the elements in the object hierarchy, Burkett could not teach "generating a set of physical coordinates corresponding to a display screen for each element in the object hierarchy, wherein the physical coordinates correspond to the logical relationship between the object hierarchy elements and the directional property associated with each element" as further recited in Claim 1. Accordingly, applicants respectfully request a withdrawal of the 35 U.S.C. § 102(e) rejection of Claim 1.

Claims 2-4 and 7-13 are dependent on Claim 1. As discussed above, Burkett fails to each teach or suggest all of the limitations recited with regard to Claim 1. Accordingly, applicants respectfully requests a withdrawal of the 35 U.S.C. § 102(e) rejection of Claims 2-4 and 7-13 for the same reasons as discussed above with regard to Claim 1. In addition, applicants respectfully submit that Claims 2-4 and 7-13 recite additional limitations related to the directional property that further establish the patentability of applicants' invention over Burkett. Examples include, but are not limited to, the association of a root element directional property to child elements and the maintenance of a truth table to preserve directional properties of specific child elements. Applicants respectfully assert that because Burkett does not teach the association of any directional properties to display elements, it would necessarily fail to teach the additional limitations found in dependent Claims 2-4 and 7-13.

B. Claims 14-17

In a manner similar to independent Claim 1, amended independent Claim 14 recites a "layout component operable to generate a set of physical coordinates for the object hierarchy corresponding to the logical relationship and a directional property for each object in the object hierarchy." As discussed above with respect to independent Claim 1, Burkett clearly fails to teach associating a directional property to each element an object hierarchy. Accordingly, it would necessarily fail to teach or suggest a layout manager that generates physical coordinates for an object hierarchy that corresponds to a directional property of the object hierarchy as recited in Claim 14. In contrast, Burkett is limited to teaching non-directional layout information including textual alignment information, physical coordinate information and/or other traditional non-directional rendering information. Because the cited reference fails to teach each and every element recited in Claim 14, applicants respectfully request withdrawal of the § 102(e) rejection with regard to Claim 14.

Claims 15-17 are dependent on Claim 14. As discussed above, Burkett fails to teach or suggest all of the limitations recited with regard to Claim 14. Accordingly, applicants respectfully requests a withdrawal of the 35 U.S.C. § 102(e) rejection of Claims 15-17 for the same reasons as discussed above with regard to Claim 14. In addition, applicants respectfully submit that Claims 15-17 recite additional limitations related to the directional property that further establish the patentability of applicants' invention over Burkett, such as the maintenance of a truth table to preserve directional properties of specific child elements. Because Burkett does not teach the association of any directional properties to display elements, it would necessarily fail to teach the additional limitations found in dependent Claims 15-17.

B. Claims 18-23

In its entirety, Claim 18 reads as follows:

18. A method for processing a direction property in a display object, the method comprising:

obtaining a display object including a graphical resource, wherein the display object includes rendering information to determine whether the graphical resource can be maintained in a specific direction;

obtaining a specified directional property specified for the display object;

determining whether the display object can be rendered according to the specified directional property.

As discussed above with respect to independent Claim 1, Burkett clearly fails to teach obtaining a directional property for a specified display object as recited in Claim 18. Accordingly, it would necessarily fail to teach or suggest determining whether the display object can be rendered in accordance with the specified directional property as further recited in Claim 18. In contrast, Burkett is limited to teaching non-directional layout information including textual alignment information, physical coordinate information and/or other traditional non-directional rendering information. Because the cited reference fails to teach each and every



element recited in Claim 18, applicants respectfully request withdrawal of the § 102(e) rejection with regard to Claim 18.

Claims 19-23 are dependent on Claim 18. As discussed above, Burkett fails to teach or suggest all of the limitations recited with regard to Claim 18. Accordingly, applicants respectfully request a withdrawal of the 35 U.S.C. § 102(e) rejection of Claims 19-23 for the same reasons as discussed above with regard to Claim 18. In addition, applicants respectfully submit that Claims 19-23 recite additional limitations related to the directional property that further establish the patentability of applicants' invention over Burkett, such as the comparison of a truth table to determine whether a display object can be rendered in accordance with a directional property. Because Burkett does not teach the association of any directional properties, it would necessarily fail to teach the additional limitations found in dependent Claims 19-23.

E. Claims 5 and 6

Claims 5 and 6 are dependent on Claim 1. As discussed above, Burkett fails to teach or suggest all of the limitations recited with regard to Claim 1. Accordingly, for the above-mentioned reasons, Claims 5 and 6 are allowable over Burkett. In addition, Claims 5 and 6 further add to the nonobviousness of applicants' invention the association of a language reading direction as the directional property.

Applicants agree with the Office Action that Burkett fails to teach or suggest a directional property in the form of a language reading direction as recited in Claims 5 and 6. As described above, Burkett is silent as to any directional properties, including language reading direction. Further, applicants respectfully submit that Edelman does not teach or suggest associating directional properties to display object hierarchies. Accordingly, Edelman would necessarily fail to teach or suggest associating a language reading direction as a directional property. In contrast,

LAW OFFICES OF  
CHRISTENSEN O'CONNOR JOHNSON KINDNESS<sup>PLLC</sup>  
1420 Fifth Avenue  
Suite 2800  
Seattle, Washington 98101  
206.682.8100

Edelman is directed toward a system for utilizing various find and replace functions for HTML documents that can include embedded display elements. The cited portion of Edelman relied upon in the Office Action corresponds solely to the implementation of the various find and replace functions recursively to account for the embedded functions. Clearly, Edelman does not teach directional properties or language reading direction as a directional property.

Generally described, under 35 U.S.C. § 103(a), a *prima facie* case of obviousness can be established only if the cited references, alone or in combination, teach each and every element recited in the claim. *In re Bell*, 991 F.2d 781 (Fed. Cir. 1993). Burkett and Edelman, alone or in combination, fail to associate a directional property with an object hierarchy. Accordingly, the cited references, alone or in combination, would necessarily fail to teach or suggest that language reading direction would be the associated reading direction as further recited in Claims 5 and 6. Accordingly, applicants respectfully request withdrawal of the § 103 rejection of Claims 6 and 6.

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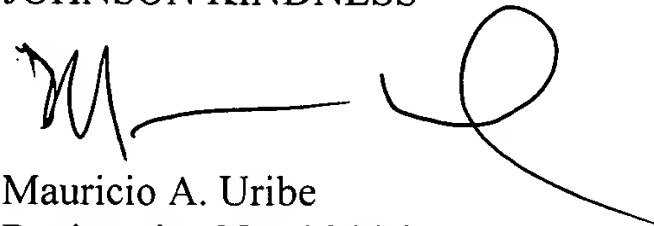
LAW OFFICES OF  
CHRISTENSEN O'CONNOR JOHNSON KINDNESS<sup>PLLC</sup>  
1420 Fifth Avenue  
Suite 2800  
Seattle, Washington 98101  
206.682.8100

### III. Conclusion

Based on the above-referenced arguments, applicants respectfully submit that all the claims of the present application, Claims 1-23, are allowable over the cited and applied references. Because the cited and applied references fail to teach or suggest associating a directional property with an object hierarchy, applicants respectfully request withdrawal of all the rejections of the claims of the present invention and allowance of the present application.

Respectfully submitted,

CHRISTENSEN O'CONNOR  
JOHNSON KINDNESS<sup>PLLC</sup>

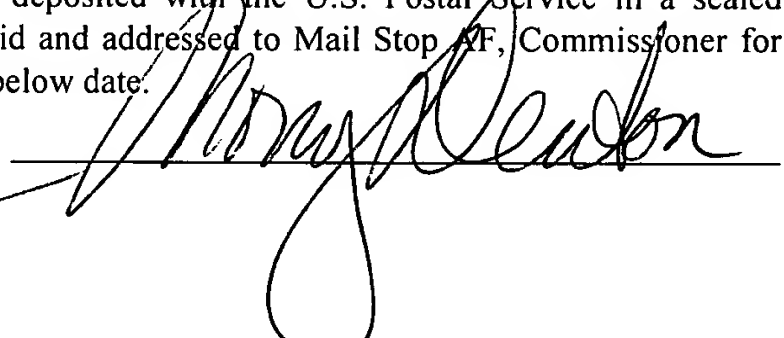


Mauricio A. Uribe  
Registration No. 46,206  
Direct Dial No. 206.695.1728

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LAW OFFICES OF  
CHRISTENSEN O'CONNOR JOHNSON KINDNESS<sup>PLLC</sup>  
1420 Fifth Avenue  
Suite 2800  
Seattle, Washington 98101  
206.682.8100